

City of Clovis (City of Clovis)

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September 12, 2025

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Comments on Proposed Amendments to Advanced Clean Fleets (ACF)

Dear Chair and Members of the Board,

We appreciate the opportunity to provide input on the proposed amendments to the Advanced Clean Fleets (ACF) regulation. We share the California Air Resources Board's (CARB) commitment to cleaner air and protecting public health. As a community in the San Joaquin Valley, the most polluted air basin in the United States, our region takes seriously its responsibility to improve air quality for our residents.

That said, we urge CARB to adopt a more realistic implementation timeline that aligns with the current maturity of the zero-emission vehicle (ZEV) industry and enables the delivery of viable heavy-duty options suitable for public agency fleets. Flexibility in implementation is critical to avoid undermining the ultimate goals of clean air and greenhouse gas (GHG) reductions by 2045.

Current regulatory frameworks disproportionately burden public fleets, while private sector exemptions persist, creating an uneven playing field and reduced market demand for needed vehicles. Without adequate flexibility, public agencies may incur untenable operational costs, potentially forcing privatization of essential services such as solid waste and transit. Private operators, however, are not bound by the same timelines or public service mandates. This imbalance increases the risk that California may miss its 2045 GHG and air quality targets.

Transit systems have shouldered early transition mandates despite the insufficient reliability of current ZEV bus technology. We have participated in pilot programs that underscore these challenges, as the ZEV buses were not usable to serve our customers. These ZEV transit vehicles have unproven long-term reliability as well as significant and costly maintenance burdens. Public transit serves as a foundational infrastructure that enables seniors and individuals with limited income to access education, healthcare, and other essential services. Imposing mandates may prematurely jeopardize these critical connections with an estimated initial capital investment of

\$150 million for the required infrastructure to support a zero-emission transit fleet. Relative to the current operations budget of \$15 million, this is a significant cost that may require increased fares and reduced services to provide the capital required.

We are also deeply concerned about the financial burden that the proposed regulatory timeline imposes, which staff have at times minimized. The impact on ratepayers, including household and commercial utility bills, must be documented transparently as it could be significant. It is estimated the additional costs will result in at least 20% increases for City of Clovis residents and businesses within the next 3 years. There is a real risk of driving local businesses out of California and disproportionately harming seniors, young families, and lower-income households.

We also caution against overreliance on exemptions as realistic solutions that provide for a well-planned implementation. Exemptions tied to infrastructure readiness are challenging. Agencies cannot accurately forecast power needs before utility plans are finalized, and multi-year lead times from utilities are typical in our experience. In addition, the City is at financial risk posed by mandatory power allotment purchases, even if unused, to get the necessary infrastructure installed. We respectfully request CARB directly coordinate with utilities to streamline these critical infrastructure issues.

Regarding ZEV purchase exemptions, specialized vehicles (e.g. solid waste, vacuum trucks) frequently lack functional zero-emission equivalents. Public agencies must have the ability to request exemptions where no legitimate ZEV alternative exists. Similarly, daily usage exemptions are difficult to implement due to absent benchmark ZEV performance data in certain sectors.

Our proposed path forward includes:

- Realistic timelines that reflect technology development and infrastructure readiness;
- Meaningful exemptions where technology or unreasonable cost barriers persist;
- State-mandated coordination with utilities to relieve local agencies' administrative and risk burdens; and
- Clear financial support mechanisms, including grants, to protect ratepayers and communities.

We look forward to CARB's continued engagement.

Thank you for your leadership and attention to these critical issues.

Sincerely,



Vong Mouanoutoua
Mayor, City of Clovis